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January 23, 2015

VIA ECF and FACSIMILE (212) 805-7927

Hon. Naomi Reice Buchwald
United States District Judge
U.S.D.C. Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Lenny Sanchez-Suarez v. Latin Quarter NY Inc. et al (Docket No. : 13 CIV 6165)*

Dear Judge Buchwald:

We represent Defendant LQ 511 Corp., Latin Quarter NY, Inc. and Augusto Camacho, in the above mentioned action. The parties have conferred with respect to the status of discovery in this matter and have agreed upon extending fact discovery for another sixty days from January 21, 2015 to March 21, 2015. The parties are also hoping to pursue settlement negotiations during this time frame as well.

The following plan has been agreed to by the parties:

Automatic Disclosures Required by Rule 26(a)(1)

Completed

Maximum # of Interrogatories by Plaintiff

35

Maximum # of Interrogatories by Defendants

35

Maximum # of Requests for Admission by Plaintiff

35

Maximum # of Requests for Admission by Defendants

35

Number of Depositions taken by Plaintiff

Parties: 6; Non-Parties: 10

Number of Depositions taken by Defendants

Parties: 6; Non-Parties: 10

Time limits for depositions of non-parties
4 hours

Date for Completion of Factual Discovery
March 21, 2015

Number of Expert Witnesses of Plaintiff:
Medical: 2; Non-Medical: 2

Date for Expert(s) Reports
June 21, 2015

Date for completion of expert discovery
July 21, 2015

Time for amendment of the pleadings by plaintiff
Within 30 days of completion of Defendant's depositions

Time for amendment of the pleadings by defendant
Within 30 days of completion of Plaintiff's depositions

Dates for filing of dispositive motion by Plaintiff
August 21, 2015

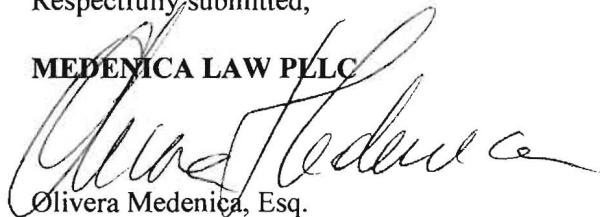
Dates for filing of dispositive motion by Defendants
August 21, 2015

Consent to trial before a Magistrate Judge pursuant to 28 U.S.C. 636(c)?
No

Thank you for your time and consideration of the submitted plan.

Respectfully submitted,

MEDENICA LAW PLLC



Olivera Medenica, Esq.

Cc: Christopher L. Van De Water, Esq. (via email)
Derek Smith Law Group, PLLC